

REMARKS

The office action continues to contend that Brown teaches holes, not nubs, as Brown thought. Not only does Brown never refer to any such holes, he talks about a nubbed brush. If some of the circles shown in the figure, which appear to be raised, are actually nubs, how does one skilled in the art determine which ones, according to the Examiner, are circles? The office action suggests that it is somehow applicants' burden of proof to prove that these are not holes, despite the contrary assertion in Brown and despite the fact that published articles indicate that these are nubs. Certainly, by any reasonable measure, that burden of proof has been clearly met. The bottom line is that there is no basis whatsoever, not a scintilla of support, for the proposition that the nubs in Brown are really holes.

Therefore, the rejection should be reconsidered.

The suggestion that Brown teaches spraying deionized water is noted, but the claim is quite specific. It requires that deionized water be sprayed at the interface while chemical and water are sprayed from within the brush. There is no dispensing of such a liquid from within the brush in Brown.

The cited teaching in Mikhaylichenko fails to meet the claimed invention because all it states is that water or chemicals may be dispensed. The suggestion that one or the other could be used does not teach dispensing both and does not teach dispensing both in the specific way claimed.

Clearly on multiple of bases, the cited combination fails to meet the claim limitations and reconsideration would be appropriate.

Respectfully submitted,

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